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June 1, 2020

Hon. James Orenstein
US District Court Eastern District of New York
225 Cadman Plaza East
Chambers Room 1227 South
Brooklyn, New York 11201

**Re: *Josiah Galloway v. County of Nassau, et al.*
Case No. 2:19 cv 05026 (AMD)(JO)
*Our File Ref.: 1444-1816***

Dear Judge Orenstein:

This office represents the Incorporated Village of Hempstead, Police Officer Steven Horowitz, Shield No. 144, and Detective Kevin Cunningham, Shield No.: 112, (the “Village Defendants”) in the above-referenced matter. I write in support of Co-Defendants’ request (DE:66) seeking: 1) an extension of time to supply responses to Plaintiff’s interrogatories and document requests, and 2) clarification as to Plaintiff’s duty to respond to our interrogatories and document requests. For the reasons explained in Co-Defendants’ request and herein, the Village Defendants request the same relief.

The Village Defendants seek a 45 day extension of the June 3, 2020 deadline to respond to Plaintiff’s discovery demands. The reason for this request is that the Village has been operating with reduced staff during the COVID-19 pandemic. The Village Attorney’s office has therefore not yet provided us with the requested responsive documents and information. All parties conferred on May 28, 2020, but Plaintiff would not consent to the requested relief.

With respect to our request for clarification as to Plaintiff’s duty to respond to our interrogatories and document demands, this office served demands upon Plaintiff by e-mail on April 16, 2020. As required by law, I was working from home at the time I sent them, and a copy is annexed hereto for reference. The background and conversation between co-Defendants’ counsel, your undersigned, and Plaintiff’s counsel is outlined in Mr. Sokoloff’s May 29, 2020 letter motion (DE:66). Following Plaintiff’s surprising position during the parties’ May 28, 2020 teleconference, that same day I served Plaintiff with electronically signed copies of the demands previously served on April 16, 2020. We have not yet received a response.

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The Village Defendants, too, ask the Court: (a) to extend our time to respond to Plaintiff's interrogatories and document requests to July 20, 2020, and (b) to affirm Plaintiff's obligation to respond to our interrogatories and document requests.

Respectfully submitted,

/s/

Andrew K. Preston